EXHIBIT A

Notice of Proposed Rulemaking
Performance Measurements and Standards for Unbundled Network Elements and Interconnection

Metric Number: Name:
OSS Pre-Order Interface Response Timeliness
Definition:
The response interval for each pre-ordering query is determined by computing the elapsed time from the ILEC receipt of the query from the CARRIER-CUSTOMER, whether or not syntactically correct, to the time the ILEC returns the requested data to the CARRIER-CUSTOMER.
Exclusions:
Business Rules:
• Elapsed time is measured in seconds for electronic pre-order requests. • Sprint defines Simple CSR as 4 or less lines and Complex as more than 4 lines.
Levels of Disaggregation:
Query Type: 　**Mechanized** 　　• Address Verification/Dispatch Required 　　• Request for Telephone Number (TN) 　　• Request for Customer Service Record (Simple, Complex) 　　• Service Availability 　　• Service Appointment Scheduling (due date) 　　• Rejected/Failed inquires 　**Manual** 　　• Facility Availability 　　• Loop Pre-qualification

Calculation:	Report Structure/Geography:

Electronic: Sum ((Query Response Date and Time) – (Query Submission Date and Time)) / (Number of Queries Submitted in Reporting Period) **Manual: Loop Pre-qualification, and Facility Availability** Sum ((Fax Date and Time Returned) - (Business Date and Time of receipt of valid fax service request)) / (Number of Faxes Submitted in Reporting Period)	State

Benchmark/Parity Performance Standard:

Benchmarks, state specific

Impact on Carriers' Regulatory Burden:

Metric Number: Name:

FOC Timeliness

Definition:

Measures the average time from receipt of a valid service request to returning a Firm Order Confirmation (FOC)/Local Service Confirmation (LSC).

Exclusions:

Business Rules:

- Elapsed time calculated in business hours.
- The start time of requests received after the end of the business day will be the beginning of the next business day. Business day is defined as published hours of operation for the ILEC ordering center.
- Excludes non-business days and ILEC published holidays.
- Excludes Loop Pre-Qualification queries.

Levels of Disaggregation:

- Electronically received/electronically handled
- Electronically received and manually handled
- By Service Group Type

Calculation:	Report Structure/Geography:
Mechanized: ((Date and Time of FOC/LSC) - (Business Date and Time of Receipt of Valid Service Request)) / (Number of FOCs/LSCs Sent in Reporting Period) **Electronic/Manual Mix:** Sum [(FOC Date and Time – (Receipt Date and Time of receipt of error free order)] / Number of FOCs sent)	State

Benchmark/Parity Performance Standard:

Benchmarks, state specific

Impact on Carriers' Regulatory Burden:

Metric Number: Name:
Reject Timeliness

Definition:

Reject interval is the elapsed time between the ILEC receipt of an order from the CARRIER-CUSTOMER to the ILEC return of a notice of a rejection to the CARRIER-CUSTOMER.

Exclusions:

- Excludes non-business days and ILEC published holidays
- Exclude rejects when the PON is received after business hours and processed prior to the beginning of the next business day.
- Exclude Loop Pre-Qualification queries created as service orders.

Business Rules:

- Elapsed time calculated in business hours.
- Calculation of requests received after the end of the business day starts at the beginning of the next business day. Business day is defined as published hours of operation for the ILEC ordering center

Levels of Disaggregation:

- Electronically received, electronically handled
  - All interfaces
  - Syntax (edit engine) and content errors (other edits)
  - Facility based/UNE orders
- Electronically received, manually handled
  - All interfaces
  - Syntax (edit engine) and content errors (other edits)
  - Facility based/UNE orders
- Manually received and handled (fax)
  - Facility based/UNE orders

Calculation:	Report Structure/Geography:
Mechanized ((Business Date and Time of ILEC Transmission of Order Rejection) - (Business Date and Time of Order Receipt)) / (# of Mechanized Orders Rejected) Electronic/Manual ((Business Date and Time of ILEC transmission of Order Rejection) – (Business Date and Time of Order Receipt)) / (#of Electronic/Manual Orders Rejected). **Manual** ((Rejection Date and Time) - (Received Date and Time)) / (Number of manual rejections sent in reporting Period)	State

Benchmark/Parity Performance Standard:

Benchmarks, state specific

Impact on Carriers' Regulatory Burden:

Metric Number: Name:
Order Completion Notifier Timeliness

Definition:
Measures the average time per order to issue notification to CARRIER-CUSTOMER of a completed order.

Exclusions:
• Excludes weekends and ILEC published holidays • Excludes Loop Pre-Qualification queries

Business Rules:
• 24 hour clock is used to measure interval for manual process

Levels of Disaggregation:
• All Electronic • Manual/Electronic Mix

Calculation:	Report Structure/Geography:
((Date and Time of Completion Notification to CARRIER-CUSTOMER) - (Date and Time of Work Completion)) / (Number of Orders Completed)	State

Benchmark/Parity Performance Standard:
Benchmarks, state specific

Impact on Carriers' Regulatory Burden:

Metric Number: Name:
Percentage of Jeopardies

Definition:

Percentage of total orders processed for which the ILEC notifies the CARRIER-CUSTOMER that the work will not be completed as committed on the original FOC.

Exclusions:

- Excludes delays for customer reasons.
- Excludes Loop Pre-Qualification queries.

Business Rules:

Levels of Disaggregation:

By Service Group Types

Calculation:	Report Structure/Geography:
((Number of Orders Jeopardized) / (Number of Orders Completed)) x 100	State

Benchmark/Parity Performance Standard:

Parity comparison

Impact on Carriers' Regulatory Burden:

Metric Number: Name:

Percentage On Time Performance

Definition:

Measures the percent of new, move and change orders where installation was completed by the due date.

Exclusions:

- Excludes customer misses
- For UNE Loop services, feature only orders are excluded from the retail analog.
- Excludes Loop Pre-Qualification queries.

Business Rules:

- Due date is defined as either original due date or final due date if the original due date was missed due to customer reasons.

Levels of Disaggregation:

- By Service Group Types
- Field Work/No Field Work as appropriate

Calculation:	Report Structure/Geography:
(Total Number of Met Due Dates Due for New, Move and Change Orders / Total Number of New, Move and Change Orders) x 100	State

Benchmark/Parity Performance Standard:
Parity comparison

Impact on Carriers' Regulatory Burden:

Metric Number: Name:

Average Delay Days On Missed Installation Orders

Definition:
Measures the average calendar days from due date to completion date on company missed orders.

Exclusions:
Excludes Loop Pre-Qualification queries.

Business Rules:

Levels of Disaggregation:
- By Service Group Types
- Disaggregated by 1-30 calendar days, 31-90 calendar days and >90 calendar days

Calculation:	Report Structure/Geography:

(Completion Date - Committed Order Due Date) / (Number of Orders Missed in the Reporting Period)	State

Benchmark/Parity Performance Standard:

Parity comparison

Impact on Carriers' Regulatory Burden:

Metric Number: Name:

Installation Quality

Definition:

Measures the percent of network customer trouble reports received within 30 calendar days of service order completion.

Exclusions:

- Excludes CPE and IEC/CARRIER-CUSTOMER caused troubles
- Excludes troubles associated with inside wire
- Excludes Trouble Reports Received on the Due Date
- Excludes Subsequent reports
- Excludes Message Reports (circuit reports for which ILEC has no records)
- Excludes ILEC employee generated reports

Business Rules:

Levels of Disaggregation:

By Service Group Types

Calculation:	Report Structure/Geography:
(Total Number of Customer Trouble reports received within 30 calendar days of service order completion / Total Number of new, move and change completed orders) x 100	State

| **Benchmark/Parity Performance Standard:** |
| Parity comparison |

| **Impact on Carriers' Regulatory Burden:** |
| |

| **Metric Number: Name:** |
| **Open Orders in Hold Status** |

| **Definition:** |
| Measures the percentage of orders that are delayed. |

| **Exclusions:** |
| • Excludes Loop Pre-Qualification queries.
• Excludes ILEC test orders, disconnect orders, ILEC administrative orders, orders that are incomplete or cancelled before the due date, orders that have passed the due date or are delayed due to competitive carrier or end-user delay, and orders not assigned a completion date. |

| **Business Rules:** |
| |

| **Levels of Disaggregation:** |
| By Service Group Types |

Calculation:	**Report Structure/Geography:**
(Number of Orders received in the current reporting period that are pending or past the committed due date) / (Number of Orders received in the current reporting period) x 100.	State

| **Benchmark/Parity Performance Standard:** |
| Parity comparison |

| **Impact on Carriers' Regulatory Burden:** |
| |

Metric Number: Name:	
Average Jeopardy Notice Interval	
Definition:	
Measures the remaining time between the pre-existing committed order completion date and time (communicated via the FOC) and the date and time the ILEC issues a notice to the CARRIER-CUSTOMER indicating an order is in jeopardy of missing the due date (or the due date/time has been missed).	
Exclusions:	
• Excludes delays for customer reasons. • Excludes Loop Pre-Qualification queries.	
Business Rules:	
Levels of Disaggregation:	
• By Service Group Types • By Jeopardy Types	
Calculation:	**Report Structure/Geography:**

	State
Assignment: *Jeopardies identified during assignment* ((Date of Committed Due Date for the Order) - (Date of Jeopardy Notice)) / (Number of Order Jeopardized) Installation: *Jeopardies identified during installation prior to due time* ((Date & Time of Committed Due Date for the Order) - (Date & Time of Jeopardy Notice)) / (Number of Installation Jeopardy Notices) Notification of Missed Commitments: (Due Date and Time of Missed Commit Notice - Due Date and Time of Order) / (Number of Missed Commit Notices)	

Benchmark/Parity Performance Standard:

Parity comparison

Impact on Carriers' Regulatory Burden:

Metric Number: Name:

Average Completion Interval

Definition:

Average business days from receipt of valid, error-free service request to completion date in service order system for new, move, and change orders.

Exclusions:

- Excludes customer requested due dates beyond interval offered, and orders delayed for customer reasons.
- For UNE Loop services, feature only orders are excluded from the retail analog.
- Excludes Loop Pre-Qualification queries

Business Rules:

Levels of Disaggregation:
• By Service Group Types • Field Work/No Field Work as appropriate

Calculation:	**Report Structure/Geography:**
Total business days from receipt of valid, error-free service request to completion date in service order system for new, move and change orders / Total new, move and change orders	State

Benchmark/Parity Performance Standard:
Parity comparison

Impact on Carriers' Regulatory Burden:

Metric Number: Name:
Trouble Report Rate

Definition:
Measures the total number of network customer trouble reports received within a calendar month per 100 circuits/UNEs.

Exclusions:
• Excludes CPE and IEC/CARRIER-CUSTOMER caused troubles • Excludes Subsequent reports • Excludes Message Reports (circuit reports for which ILEC has no records) • Excludes ILEC employee generated reports

Business Rules:
Access line/circuit count taken from previous month

Levels of Disaggregation:
By Service Group Types

Calculation:	Report Structure/Geography:
(Total Number of Customer initial and repeat network trouble reports / Number of access lines/circuits/UNEs in service at the end of the prior reporting period) x 100	State

Benchmark/Parity Performance Standard:

Parity comparison

Impact on Carriers' Regulatory Burden:

Metric Number: Name:

Repeat Trouble Report Rate

Definition:

Measures the percent of customer network trouble reports received within 30 calendar days of a previous report.

Exclusions:

- Excludes CPE and IEC/CARRIER-CUSTOMER caused troubles
- Excludes troubles associated with inside wiring
- Excludes Subsequent reports
- Excludes Message Reports
- Excludes ILEC employee generated reports

Business Rules:

Includes LNP NXX Code Opening troubles

Levels of Disaggregation:

By Service Group Types

Calculation:	Report Structure/Geography:

(Total customer network trouble reports received within 30 calendar days of a previous customer report / Total customer network trouble reports) x 100	State

Benchmark/Parity Performance Standard:

Parity comparison

Impact on Carriers' Regulatory Burden:

Metric Number: Name:

Time to Restore

Definition:

Measures the average duration of customer trouble reports from the receipt of the customer trouble report to the time the trouble is cleared.

Exclusions:

- Excludes CPE and IEC/CARRIER-CUSTOMER caused troubles
- Excludes Subsequent reports
- Excludes Message Reports (circuit reports which ILEC has no records on)
- Excludes ILEC employee generated reports

Business Rules:

Includes LNP NXX Code Opening troubles

Levels of Disaggregation:

- By Service Group Types
- Dispatch vs No Dispatch

Calculation:	Report Structure/Geography:
(Total duration of customer network trouble reports) / (Total customer network trouble reports)	State

Benchmark/Parity Performance Standard:

Parity comparison
Impact on Carriers' Regulatory Burden:

Metric Number: Name:
Percent Blockage on Dedicated Interconnection Trunks
Definition:
Measures the percent of final dedicated interconnection trunk groups exceeding 2% blockage.
Exclusions:
• Excludes blocking failures where CARRIER-CUSTOMER doesn't complete their end of augmentation
Business Rules:
• Only measured on trunks where ILEC has outgoing traffic to CARRIER-CUSTOMERs, and where ILEC controls trunk capacity.
Levels of Disaggregation:
none

Calculation:	**Report Structure/Geography:**
(Number of final dedicated interconnection trunk groups exceeding 2% blockage / Total number of final dedicated interconnection trunk groups) x 100	State

Benchmark/Parity Performance Standard:
Diagnostic only
Impact on Carriers' Regulatory Burden:

Metric Number: Name:
Bill Timeliness

Definition:
This measure captures the elapsed number of calendar days between the scheduled close of a Bill Cycle and the ILEC's transmission availability of the associated invoice to the CARRIER-CUSTOMER.

Exclusions:
- Includes only mechanized bills.   - Excludes paper bill, magnetic bill, CD ROM bill or Custom Bill diskette bill.

Business Rules:

Levels of Disaggregation:
- UNE   - Facilities/Interconnection

Calculation:	Report Structure/Geography:
(Count of Invoices where difference between distribution date and bill date is less than or equal to 10) / Count of Total Invoices Distributed within the Reporting Period) x100	State

Benchmark/Parity Performance Standard:
99% within 10 calendar days (applicable to each disaggregation)

Impact on Carriers' Regulatory Burden:

Metric Number: Name:
Billing Accuracy

Definition:

Measures the percentage of the total bill amount that is not adjusted by correcting service orders or adjustments, for a six month rolling average.

Exclusions:

- Excludes late charges resulting from mandated billing changes if Sprint makes its changes on time.
- Excludes Uncollectable status accounts, restoration charges, non-recurring charges billed in installments, non-regulated charges, refunds of deposits, transfer of payments or balances, returned check charges, taxes, and surcharges.
- Excludes adjustments issued for reasons not related to bill accuracy

Business Rules:

Levels of Disaggregation:

- UNE – Diagnostic Only
  - Usage
  - Recurring Charges
  - Non-Recurring Charges
- Facilities/Interconnection – Diagnostic Only
  - Usage
  - Recurring Charges
  - Non-Recurring Charges

Calculation:	Report Structure/Geography:
(Total monies billed without corrections during current month and 5 prior months / total monies billed during current month and 5 prior months) x 100	State

Benchmark/Parity Performance Standard:

Diagnostic only

Impact on Carriers' Regulatory Burden: